

Feedback Form

Long-Term 2 (LT2) RFP – April 4, 2024

Feedback Provided by:

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Date: April 23, 2024

To promote transparency, feedback submitted will be posted on the Long-Term RFP engagement page unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark "Confidential".

Following the LT2 RFP April 4, 2024, engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed during the webinar. The webinar presentation and recording can be accessed from the [engagement web page](#).

Please submit feedback to engagement@ieso.ca by April 23, 2024.

Enhanced Power Purchase Agreement (E-PPA) Revenue Model: Proposed Modifications

Topic	Feedback
Do you have any comments regarding use of monthly production factors for the calculation of deemed energy revenues?	SWEB supports the use of monthly production factors.
Do you have any comments regarding use of the Forecasted Weighted Average Price (FWAP)?	SWEB supports the use of Forecasted Weighted Average Price, but suggests that the IESO provide more information on the IESO's forecasted production capability, its sources and its derivation.
Do you have any comments or suggestions on further mitigating perceived risks associated with VG participation in the DAM?	<p>Due to the fact that market renewal is yet to be launched, proponents do not have historical information to draw upon to know what the DA to RT price spread will be. Further, we recommend that the IESO provide proponents with the choice to (a) deem revenues under such risk-sharing mechanism or (b) deem based on the DA price without the risk-sharing mechanism.</p> <p>If the IESO is not willing to consider allowing proponents with the choice between aforementioned scenarios A and B, the contract should implement some type of maximum RT and DA spread to limit lost revenues due to unforeseeable market variability, or incorporate some type of mitigation factor to address the potential for large variations in RT and DA prices that cannot be predicted at the time of bid.</p>

LT2 RFP & Contract: Key Provisions

Topic	Feedback
Do you have any comments regarding the use of minimum production factors during proposal evaluation?	No comment.
Do you have any comments regarding the application of the non-performance charge?	<p>Proponents already receive a form of non-performance penalties when actual energy production is less than the production factors bid via less realized revenue.</p> <p>SWEB supports CanREA's comments regarding greater flexibility given to smaller projects and their corresponding performance minimums.</p>

Topic	Feedback
Do you have any comments regarding the treatment of outages under the LT2 Contract?	Mitigation measures should be applied for sustained outages due to utility work that would be unforeseeable to the Proponent.
Do you have any comments regarding the payback of Deemed Market Revenues greater than the Monthly Revenue Requirement?	SWEB seeks more information to fully understand this design proposal. It should be noted that payback of Deemed Market Revenues is a downside for Proponents, and should be balanced with a reduction in allocation of risk.

MT2 RFP

Topic	Feedback
Do you have any comments regarding the IESO's considerations on the MT2 RFP, including timing, eligibility, and the interplay between repowering and the MT2 and LT2 RFPs?	No comments.

Long Lead Time Resources

Topic	Feedback
Do you have any comments regarding the IESO's considerations on Long Lead Time Resources, including timing, eligibility, targets, and term?	No comments.

General Comments/Feedback